

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,
Plaintiff,
v.

**NOTICE OF MOTION
TO FILE UNDER SEAL**

JOSEPH BONGIOVANNI,
Defendant.

CASE NO. 19-CR-00227JLS-JJM

STATE OF NEW YORK)
COUNTY OF ERIE) ss:
CITY OF BUFFALO)

PAUL J. CAMBRIA, JR., ESQ., being duly sworn, deposes and says:

1. I, along with Justin D. Ginter, Esq., represent the defendant Joseph Bongiovanni.

2. Your deponent requests that a letter motion addressing issues brought up at today's, February 7, 2020, oral argument be filed under seal because the information set forth therein deals with issues in the case that should not be made available to the public.

WHEREFORE, your deponent prays that this Court rule accordingly.

DATED: Buffalo, New York
February 7, 2020

Respectfully submitted,

/s/Paul J. Cambria, Jr., Esq.
PAUL J. CAMBRIA, JR., ESQ.
LIPSITZ GREEN SCIME CAMBRIA LLP
Attorneys for Defendant
JOSEPH BONGIOVANNI
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Buffalo, New York 14202
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Subscribed and sworn to before me
this 7th of February, 2020

/s/Alexander E. Basinski
Notary Public, State of New York
Qualified in Erie County
My Commission Expires August 6, 2022

TO: JOSEPH TRIPI, ESQ.
ASSISTANT UNITED STATES ATTORNEY
Federal Centre
138 Delaware Avenue
Buffalo, New York 14202